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Attorney for Plaintiff.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF THE NORTHERN MARIANA ISLANDS**

SAIPAN HANDICRAFT,]	Civil Action No. 05-0040
]	
Plaintiff,]	
vs.]	
]	
MICRONESIA WOODCRAFT ENT., INC.,]	CERTIFICATE PURSUANT
et al.,]	TO LR 7.1.h.3(b) IN SUPPORT
]	OF <i>EX PARTE</i> MOTION FOR
Defendants.]	ORDER SHORTENING TIME
]	

I, F. Matthew Smith, in support of the *Ex-Parte* Motion for Order Shortening Time, hereby certify and declare, under penalty of perjury, as follows:

1. My name is F. Matthew Smith. I am attorney of record for Plaintiff Saipan Handicraft and its owners and managers Adela Capati and Rodrigo Capati.
2. I have filed herewith a Motion to Withdraw as counsel for Plaintiff due to conflicts that render my continuing representation impossible.
3. It is important that such withdraw take place as quickly as possible in order that Plaintiffs can proceed with their case and litigation and address pending deadlines and upcoming matters.
4. I have spoken with the District Court Clerk regarding a date and time that a hearing

on my motion to withdraw can be heard, and was informed that the Court would be available to hear such a motion on Friday, September 22, 2006, at 9:30 am.

5. I have corresponded by email with the attorneys of record who are representing opposing parties (*i.e.*, Edward Manibusan; Danilo T. Aguilar; and Richard Pierce) about this *ex-parte* motion, my motion to withdraw and about a hearing thereon on September 22, 2006, at 9:30 am – and none of the attorneys of record object to an order shortening time or to a hearing on the motion to withdraw at said date and time.

6. As stated in my withdrawal moving papers, I have spoken several times with my clients about this matter and my need to withdraw; and have caused copies of all filed documents related thereto to be mailed to Rodrigo Capati in the Phillippines on September 14, 2006; and have hand delivered the same to Adela Capati on said date. In addition, I will make further efforts between the date of this certification and the date of hearing to obtain either signed consents from my clients or to coordinate their appearances, by phone or in person, at any motion hearing.

7. There are several named defendants who have failed to file any answers or responses to the filed amended complaint, but who I have been talking to about possible settlement at various times during the months since the filing of our amended complaint. Although these defendants are in default and are unrepresented, I am causing my staff to contact them, as best as is practicable before the requested September 29, 2006, hearing, by phone and/or mail to advise them of both this *ex parte* motion and the motion to withdraw.

I certify and declare that the foregoing is true and correct and that I executed this declaration on September 14, 2006, on Saipan, CNMI.


F. MATTHEW SMITH